

September 27, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Attention: Chief, Wireline Competition Bureau

**Re: WC Docket No. 10-90
Challenge to Windstream and AT&T Requests for Connect America Fund Phase I
Round 2 Support**

Dear Ms. Dortch,

Fort Mill Telephone Company, Lancaster Telephone Company, and PBT Communications (“Comporium Companies”) hereby file this challenge to Windstream and AT&T requests to receive support in the second round of the Connect America Fund Phase I (“CAF Phase I Round 2”) to provide broadband service to locations within the enclosed list of census blocks. The Comporium Companies currently provide broadband service at or above 3 Mbps download, 768 kbps upload in the census blocks identified in Attachment A and Attachment C, and the Comporium Companies respectfully request that the Wireline Competition Bureau take into consideration the evidence provided herein as it makes its final determinations about which census blocks are ultimately eligible to receive CAF Phase I Round 2 support.

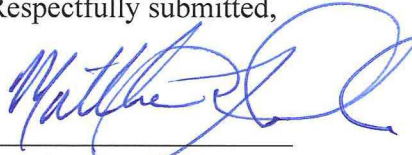
On August 28, 2013, the Federal Communications Commission (“FCC”) released a Public Notice (DA 13-1832) which instructed interested parties “to challenge price cap carrier’s Phase I deployment plans by demonstrating that a block in question is already served by fixed Internet access with the requisite speeds.”¹ The Public Notice included a list of all census blocks that the price cap carriers are requesting to receive CAF Phase I Round 2 support to provide broadband. The Comporium Companies have reviewed this list and identified census blocks in the attached list that should not be eligible for CAF Phase I Round 2 support because the Company already provides broadband in those blocks at a speed of at least 3 Mbps/768 kbps.

¹ Wireline Competition Bureau Publishes Census Blocks, and Commences Challenge Process, for Second Round of Connect America Fund Phase I, WC Docket No. 10-90, Public Notice, DA 13-1832 (rel. August 28, 2013) (“August 28 Public Notice”).

I, Matthew L. Dosch, Senior Vice President of External Affairs for the Comporium Companies hereby certify under penalty of perjury that the Comporium Companies provide fixed broadband in the census blocks listed below. The Comporium Companies understand that Windstream and AT&T are requesting CAF Phase I Round 2 support in these census blocks because Windstream and AT&T do not provide broadband at or above 3 Mbps/768 kbps to locations in these census blocks. However, The Comporium Companies do provide broadband at or above 3 Mbps/768 kbps in the census blocks listed below. The Comporium Companies offer to make billing records available to the FCC upon request and provide maps in Attachment B and Attachment D to illustrate that the Comporium Companies provide broadband service in the census blocks listed below.

In conclusion, The Comporium Companies urge the FCC to eliminate the census blocks listed below from CAF Phase I Round 2 eligibility.

Respectfully submitted,



Matthew L. Dosch
Senior Vice President of External Affairs
Comporium
330 East Black Street
Rock Hill, SC 29730
803-326-7287

cc: Ryan Yates, Wireline Competition Bureau, Telecommunications Access Policy Division

Enclosures

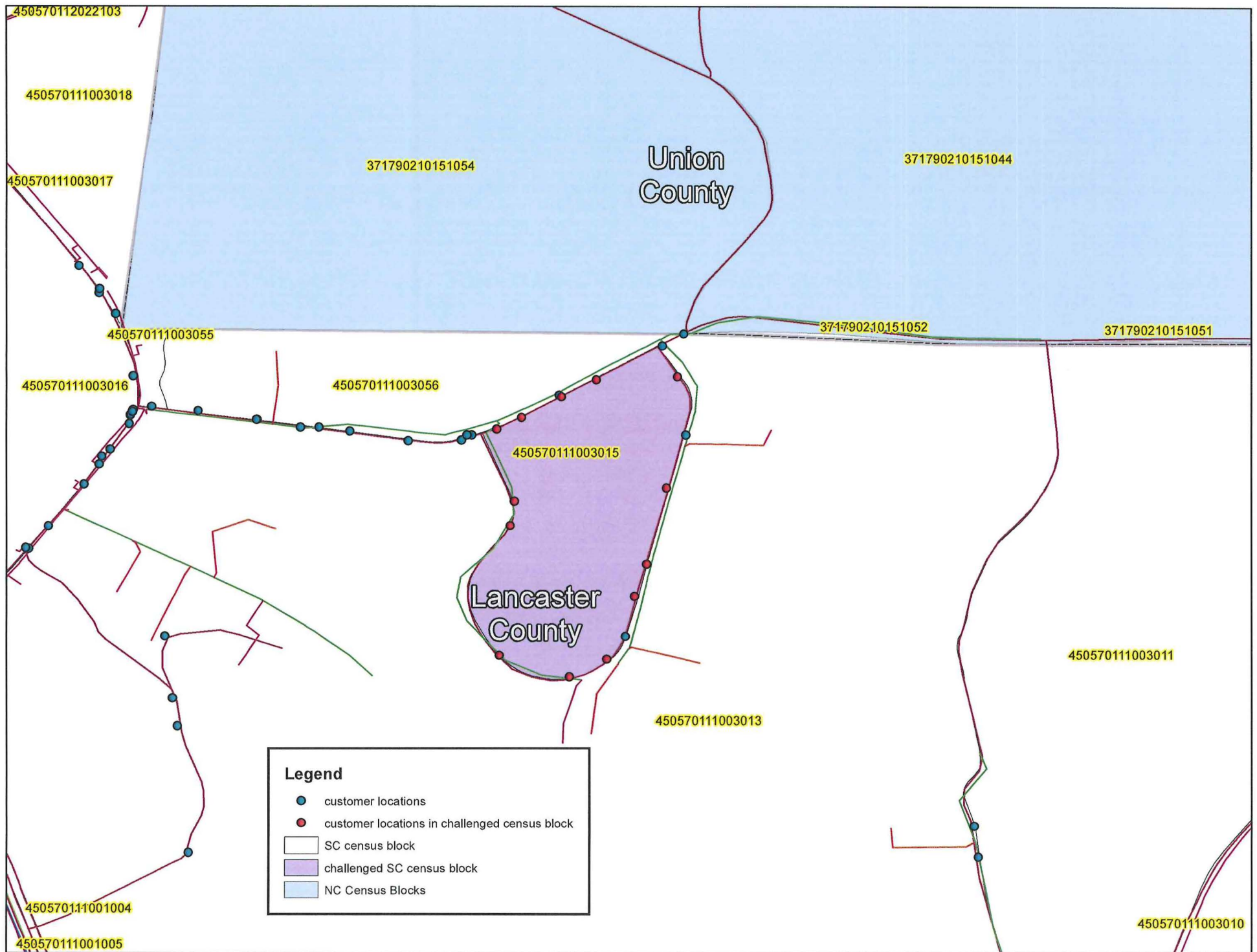
ATTACHMENT A:
CHALLENGED CENSUS BLOCKS ELECTED BY WINDSTREAM

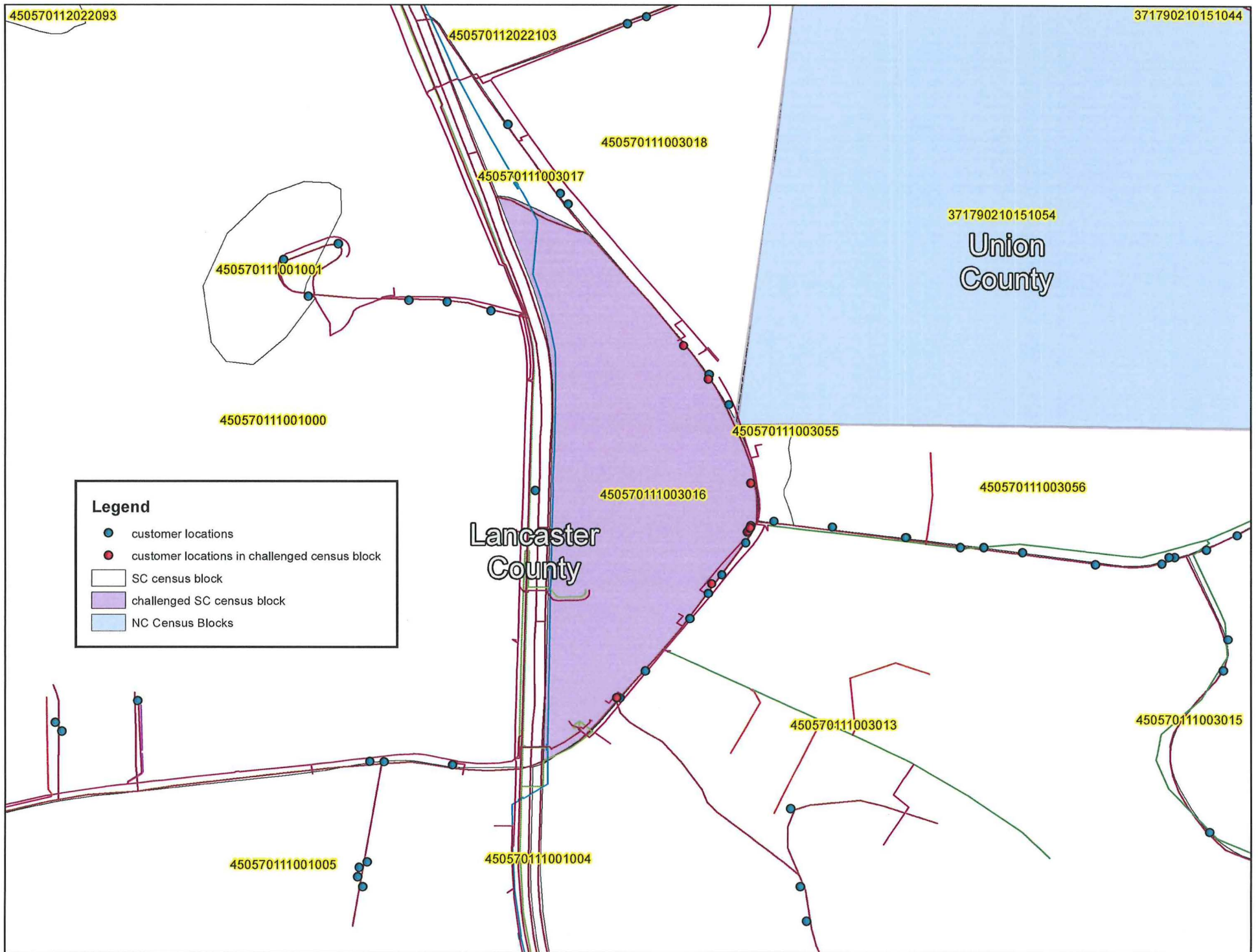
The following census blocks are identified in the August 28 Public Notice as census blocks that Windstream is requesting CAF Phase I Round 2 support for the deployment of broadband in South Carolina, which the Comporium Companies challenge and urge the FCC to determine that these census blocks are ineligible for CAF Phase I Round 2 support. The Comporium Companies are the incumbent providers in these census blocks and already provide broadband at or above 3 Mbps/768 kbps within these census blocks.

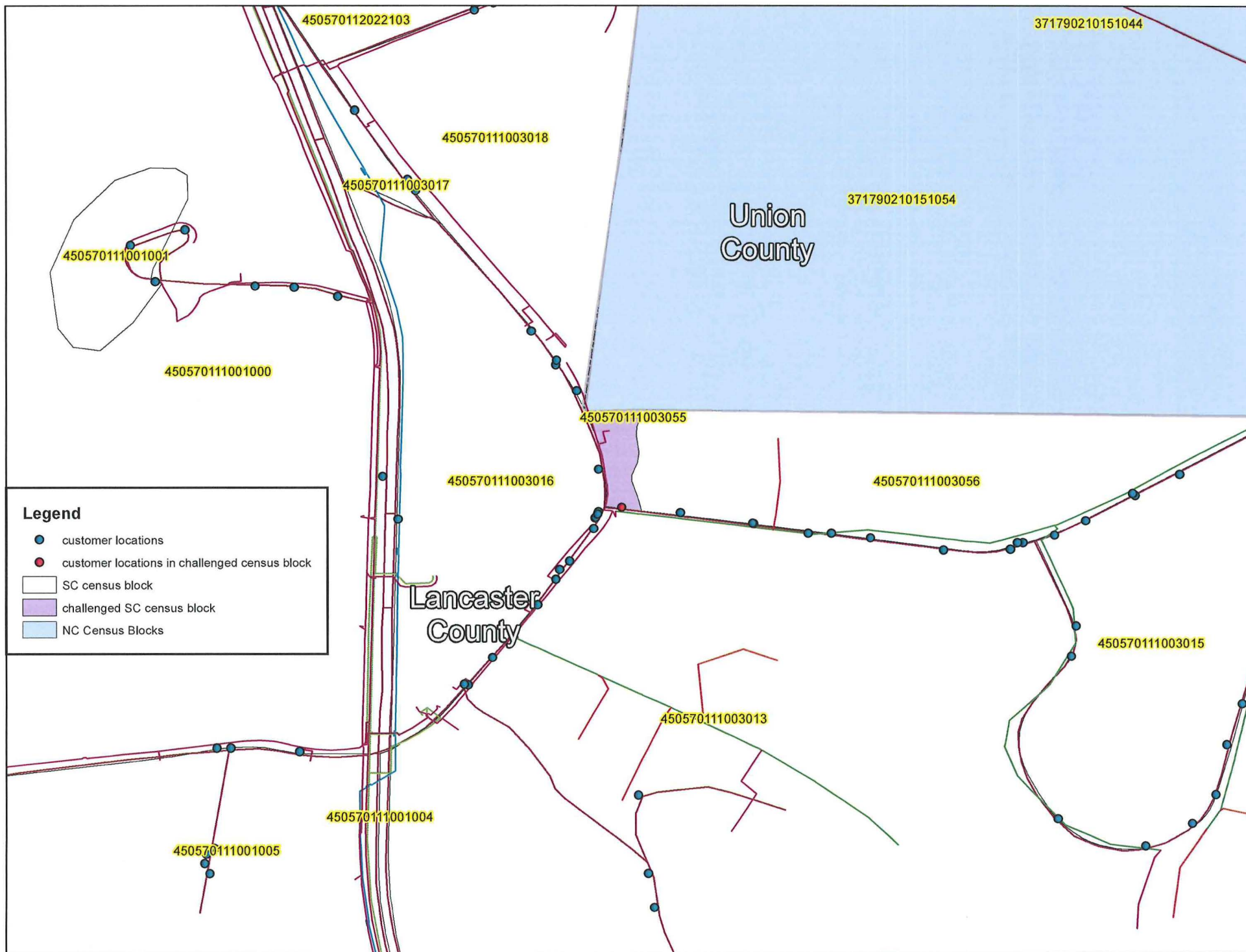
450570111003015 – Lancaster Telephone Company
450570111003016 – Lancaster Telephone Company
450570111003055 – Lancaster Telephone Company
450570111003056 – Lancaster Telephone Company
450570112012005 – Fort Mill Telephone Company
450570112012006 – Fort Mill Telephone Company

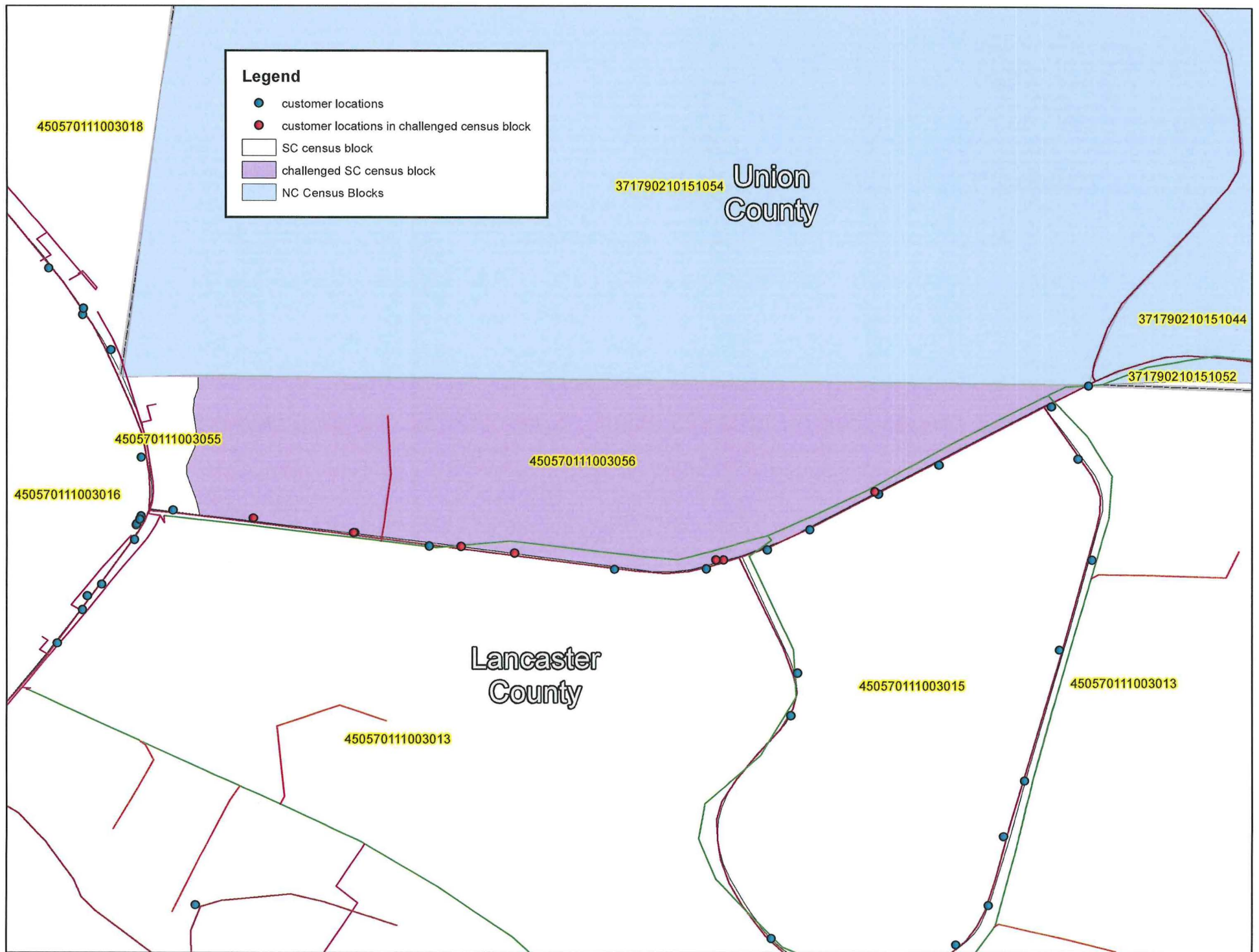
ATTACHMENT B:
SUPPORTING EVIDENCE OF SERVICE IN CENSUS BLOCKS ELECTED BY
WINDSTREAM

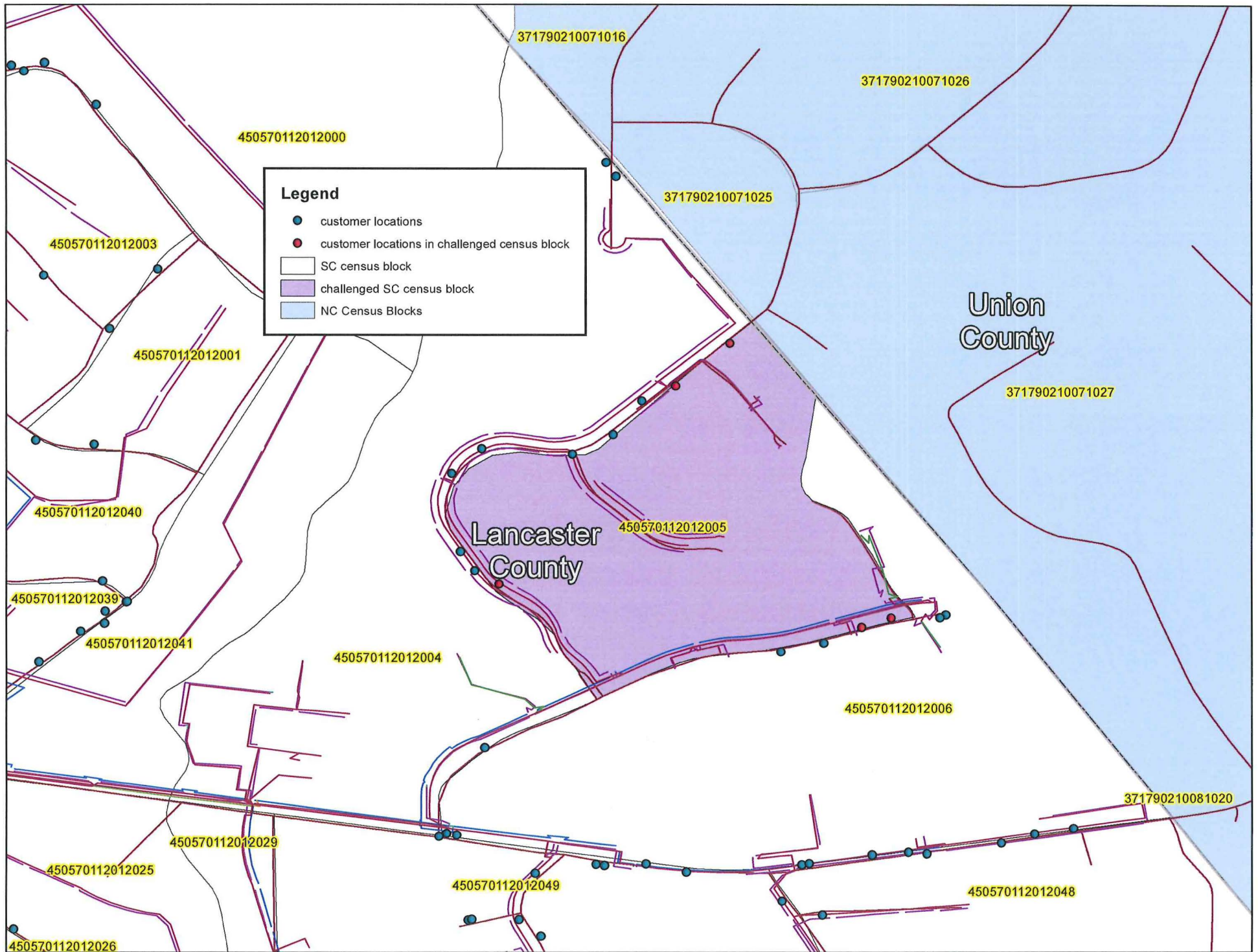
Pursuant to the rules for the challenge process established in the FCC's May 22 Report and Order, "All filings...must be supported by some form of documented evidence." The Comporium Companies submit as evidence the following maps illustrating the Companies' service areas in the census blocks listed in Attachment A.

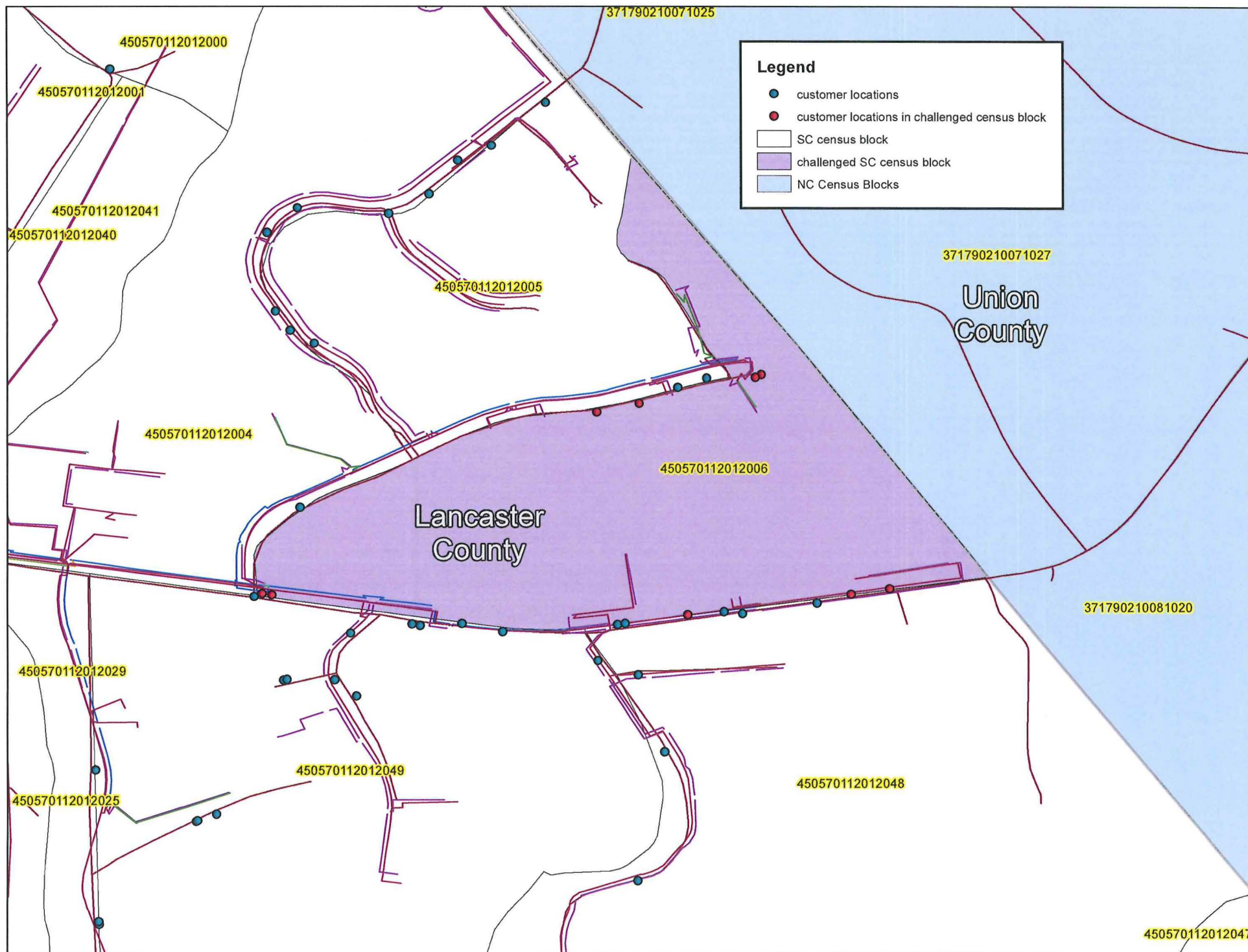












ATTACHMENT C:
CHALLENGED CENSUS BLOCKS ELECTED BY AT&T

The following census blocks are identified in the August 28 Public Notice as census blocks that AT&T is requesting CAF Phase I Round 2 support for the deployment of broadband in South Carolina, which the Comporium Companies challenge and urge the FCC to determine that these census blocks are ineligible for CAF Phase I Round 2 support. PBT Communications provides broadband at or above 3 Mbps/768 kbps within these census blocks.

PBT Communications provides broadband as a CLEC in the following census blocks:

450030201001014

450030201001015

ATTACHMENT D:
SUPPORTING EVIDENCE OF SERVICE IN CENSUS BLOCKS ELECTED BY AT&T

Pursuant to the rules for the challenge process established in the FCC's May 22 Report and Order, "All filings...must be supported by some form of documented evidence." The Comporium Companies submit as evidence the following maps illustrating PBT Communications' service areas in the census blocks listed in Attachment C.

